

Attached

Public Commentor
given To The City
of Edgerton —

City has contact
information —

COMMENTS
U.S. ARMY CORPS OF ENGINEERS
PERMIT NO. 2006-1014
GARDNER INTERMODAL FACILITY

Upon reviewing the public notice for this permit, I have three general comments. One, I believe that there should be a concern about the potential for oil, fuel, and similar byproducts to be indirectly discharged (i.e. leakage from storage containers, vehicles, etc.) into the adjacent waterways. This issue should be addressed in some manner since these adjacent waterways flow into Big Bull Creek, a tributary of Hillsdale Lake, which is an important source of water for a significant amount of people in the region. Adequate safeguards to prevent discharge of these and any other contaminants should be considered to be in the public interest. Preventive measures should be described and agreed upon at the conceptual stages in order to ensure that an issue of this high degree of importance receives a sufficient amount of attention throughout the development process.

The second concern that I have is on the wetland areas. The notice indicates that 3.12 acres of emergent wetlands, 1.18 acres of forested wetlands, and 0.31 acres of scrub shrub wetlands would be impacted. It seems to me that there is an opportunity to create new wetlands areas that would not only offset the disturbed wetlands but could also serve in the best interests of the proposed development. An enlarged wetland area would not only establish new wetland area but would also greatly reduce the potential impacts of future flooding on the new development. This would actually be a benefit to both the environment and the developers. Furthermore, the clear delineation of an enlarged wetland area would act as a distinct buffer that could mitigate the potential effects of contaminants from the developed area by limiting the exposure of the waterway.

The other concern that I have is from a broader planning perspective. With the Mildale Park and the adjoining future Big Bull Creek Park to the southwest and the Kansas City Power and Light Wetlands to the northeast, it appears as though a more substantial conservation effort may be appropriate. Setting aside the area that is between the wetland area (conservation corridor) and the BNSF mainline that is just south of U.S. Highway 56 would serve the public interest in many ways. First, a conservation area would be a logical connection of the existing greenspace of the parkland with the existing preserved wetland area. Second, such a conservation area could be used as a visual

buffer to help minimize the effects of industrial development on a rapidly growing suburban community. Given that there is a highly active and vocal opposition to this project, the importance of a visual buffer on the landscape is significant. Third, retaining the proposed use of this land for industrial use would greatly increase the risk of contaminants being indirectly introduced to the waterway by numerous daily truck trips across the waterway. Minimizing exposure to contaminants would greatly reduce the potential risk of this kind of indirect pollution. Four, retaining this proposed use would also seem to be contrary to the general concept of restricting access from the intermodal facility to U.S. Highway 56. By setting this area aside, development would be focused more on its intended area to the south of the intermodal facility, heading towards Interstate 35. Five, setting aside this area would have a beneficial impact on native plant and animal life by preserving natural habitat in an area that will likely lose a significant amount of habitat in the near future to the encroaching metropolitan area around it. Six, it is logical to place a conservation area adjacent to a wetland area. This would have the effect of somewhat extending the wetland area, further diminishing the potential effect of contaminants by significantly limiting their proximity to the waterway. Seven, a conservation effort in this area would enhance the quality of a nearby historic landmark. A historic trails monument is currently being constructed at the intersection of U.S. Highway 56 and 183rd Street to commemorate the location in the vicinity where the Santa Fe, Oregon, and California trails divided. A visible conservation effort directly on the other side of U.S. Highway 56 will help to preserve a portion of the adjacent landscape for future tourists of this landmark and outdoor exhibit. It is important to note the Santa Fe, Oregon, and California Trails are essential parts of American history and that attempts to preserve a portion of the landscape to try to resemble that period of time would be logical and would be a benefit for historical preservation as well.

Addressing these and other relevant concerns at this stage of the development should allow for the proposed development to be responsive to the environment and historic resources while also producing substantial positive economic effects on the area. The anticipated long-term benefits should exceed the potential environmental costs as long as active steps are taken to mitigate the effects of the intermodal facility and its related development and to protect the environment and historic resources.